

EXHIBIT B

From: Wiltey, Connie
Sent: Tuesday, January 08, 2019 8:27 AM
To: Freeman, Christopher B.
Subject: FW: URGENT!! Cease and Desist Any Transfer of IOLTA Funds Belonging to Coface North America Insurance Company

See below.

From: Jay Davis [<mailto:jay@jdavislegal.biz>]
Sent: Monday, January 07, 2019 6:17 PM
To: Wiltey, Connie
Subject: Re: URGENT!! Cease and Desist Any Transfer of IOLTA Funds Belonging to Coface North America Insurance Company

Mr. Freeman,

In response to your voicemail today at my office, I want to express my distress at what is obviously a difficult issue for your client and what has turned out to be distressing for me as well. I responded immediately to your request by tendering the balance left in the account by debit, and, unfortunately some funds belonging to other clients of mine that Wells Fargo insisted be returned to as well. About \$3,500 of the money belonged to other clients. I will need to figure out how to deal with that issue. Also, Wells Fargo has closed my IOLTA Trust account because I received funds from your client as the source that reported fraud on that wire delivery. That has cost me quite a bit of time and energy to deal with. Hopefully, at Wells Fargo they will allow me to open another IOLTA Trust account in the immediate future.

I called the State Bar today to see what I should do in response to your voicemail today, and they have suggested I hire counsel to help me deal with the issue. I have a meeting set up with counsel on Friday to discuss the matter. I will respond asap thereafter, or my counsel will, as he advises.

I don't think there are timeliness matters, if that helps.

Jay Davis, Attorney at Law

On Thu, Jan 3, 2019 at 3:23 PM Wiltey, Connie <cwiltey@carltonfields.com> wrote:

Good afternoon, Mr. Davis. The attached letter is sent on behalf of Chris Freeman regarding the above matter. A hard copy is also being hand delivered to you this afternoon. Thank you.

Connie Wiltey

Legal administrative Assistant to

Christopher B. Freeman



Connie Wiltey

Legal Administrative Assistant

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